

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

BENJAMIN CHOW,
a/k/a “Ben Chow Zhou Bin,”
a/k/a “Benjamin Bin Chow,”
a/k/a “Bin Zhou,”

Defendant.

17 Cr. 667 (GHW)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Roman E. Darmer, Esq., dated December 19, 2017, the exhibits attached thereto, and the accompanying Memorandum of Law, defendant Benjamin Chow, by his undersigned attorneys, will move this Court before the Honorable Gregory H. Woods, at the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order (a) quashing the grand jury subpoena issued to Partner-1 (as defined in the accompanying Memorandum of Law), (b) precluding the government’s use of evidence obtained through the improper use of the grand jury subpoena issued to Partner-2 (as defined the accompanying Memorandum of Law), and (c) adjourning the return date of the subpoena issued to Partner-1 while this motion is under consideration.

Dated: December 19, 2017
New York, New York

Respectfully submitted,

/s/

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